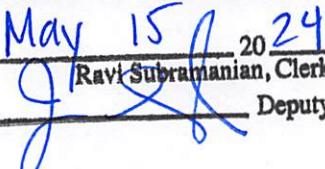


1
2 Presented to the Court by the foreman of the
3 Grand Jury in open Court, in the presence of
4 the Grand Jury and FILED in the U.S.
5 DISTRICT COURT at Seattle, Washington.

6
7 
8 May 15 2024
9 Ravi Subramanian, Clerk
10 By  Deputy

11
12 UNITED STATES DISTRICT COURT FOR THE
13 WESTERN DISTRICT OF WASHINGTON
14 AT SEATTLE

15 UNITED STATES OF AMERICA,
16 Plaintiff,

17 NO. CR 24-086 TL

18
19 INDICTMENT

20
21 v.
22 KEITH DANIEL FREERKSEN,
23 Defendant.

24
25 The Grand Jury charges that:

26
27 **COUNT 1**

28
29 (Travel with Intent to Engage in a Sexual Act with a Minor)

30 Between on or about January 3, 2024, and January 8, 2024, in Skagit County,
31 within the Western District of Washington, and elsewhere, KEITH DANIEL
32 FREERKSEN did knowingly travel in interstate commerce, to wit, between South Haven
33 Township, Michigan, and Mount Vernon, Washington, for the purpose of engaging in
34 illicit sexual conduct with a person under the age of eighteen, that is, the sexual acts of
35 contact between the penis and the vulva, contact between the mouth and the penis, and
36 contact between the mouth and the vulva.

1 All in violation of Title 18, United States Code, Sections 2423(b) and 2246(2)(A)
2 and (B).

3 **FORFEITURE ALLEGATION**

4 The allegations contained in Count 1 of this Indictment are hereby realleged and
5 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the
6 offense alleged in Count 1, KEITH DANIEL FREERKSEN shall forfeit to the United
7 States, pursuant to Title 18, United States Code, Section 2428(a), any property that was
8 used or intended to be used to commit or to facilitate the commission of such offenses,
9 and any property constituting or derived from proceeds of the offense.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with, a third party;
5 c. has been placed beyond the jurisdiction of the Court;
6 d. has been substantially diminished in value; or,
7 e. has been commingled with other property which cannot be divided
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

12 A TRUE BILL: *yes*

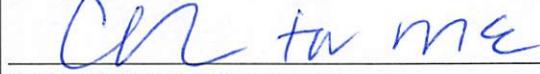
13 DATED: *May 15, 2024*

14
15 *Signature of Foreperson redacted pursuant*
16 *to the policy of the Judicial Conference of*
17 *the United States.*

18

FOREPERSON

19 
20 TESSA M. GORMAN
21 United States Attorney

22 
23 MARCI ELLSWORTH
24 Assistant United States Attorney

25 
26 CECELIA GREGSON
27 Assistant United States Attorney